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Monthly Oversight Report 32 ACS NPL Site Griffith, Indiana August 2, 2003 - August 29, 2003 101 N. Wacker Drive

Black & Veatch Special Projects Corp.

Suite 1100 Chicago, Illinois 60606-7302

Tel: (312) 346-3775 Fax: (312) 346-4781

USEPA/RAC VII

American Chemical Services RAO (057-ROBF-05J7)

BVSPC Project 46526 BVSPC File C.3 September 8, 2003

Mr. Kevin Adler U.S. Environmental Protection Agency 77 W. Jackson Boulevard (SR-6J) Chicago, Illinois 60604-3590

Subject:

Monthly Oversight Summary Report

No. 32 for August 2003

Dear Mr. Adler:

Enclosed is the Monthly Oversight Summary Report No. 32 for August 2003 for the American Chemical Services Superfund Site in Griffith, Indiana.

If you have any questions, please call (312-683-7856) or email (campbelllm@bv.com).

Sincerely,

BLACK & VEATCH Special Projects Corp.

Larry M. Campbell, P.E.

Site Manager

Enclosure

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Monthly Oversight Summary Report No. 32 ACS Superfund Site WA57, 46526.238

Reporting Period: Month of August (August 2, 2003 - August 29, 2003)

BVSPC O/S Dates: August 8, 18, and 26, 2003

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	5	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Independent Environmental Services	2	Specialty Contractor
Austgen	1	Electrical Contractor
Ryan Construction	2	General Contractor
Fliteway	1	ONCA SBPA ISVE System Blower Shed Contractor
Environmental Contractors of Illinois	5	OFCA Engineered Cover Contractor
Area Survey	2	Surveying Contractor
Cochrane Compressor	2	Compressor Maintenance Contractor
Midwest Environmental, Inc.	6	OFCA Engineered Cover Erosion Repair Contractor

Construction Activities

Major Activities:

- Ryan Construction repaired the damage that it caused to the American Chemical Services employee breakroom building.
- Fliteway installed a vibration damper between the condensate knockout tank and blower in the On-Site Containment Area Still Bottoms Pond Area in-situ soil vapor extraction system blower shed building #1.
- Area Survey surveyed the gravel portion of the On-Site Containment Area Still Bottoms Pond Area interim cover.

- Environmental Contractors of Illinois added topsoil and seeded a portion of the Off-Site Containment Area engineered cover where the topsoil cover did not meet the design thickness.
- Midwest Environmental repaired the erosion damage to the Off-Site Containment Area engineered cover.
- Montgomery Watson Harza operated the Off-Site Containment Area and On-site Containment Area Still Bottoms Pond Area in-situ soil vapor extraction systems intermittently during the reporting period.
- Montgomery Watson Harza reported that the groundwater treatment plant sustained damage to several control panels and components after being struck by lightening on August 1, 2003.
- Independent Environmental Services and Austgen performed maintenance activities in the groundwater treatment plant.
- Cochrane Compressor replaced a compressor head for an air compressor at the groundwater treatment plant.
- Ryan Construction installed additional piping at the groundwater treatment plant in preparation for the installation of a nanofiltration unit.
- Montgomery Watson Harza held bi-weekly construction coordination meetings at the site on August 7 and 21, 2003.

Activities Performed:

Ryan Construction repaired the damage it caused to the American Chemical Services employee breakroom building during the installation of the concrete retaining wall last reporting period. On August 15, 2003, Fliteway installed a vibration damper between the condensate knockout tank and the blower in the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) in-situ soil vapor extraction (ISVE) system blower shed building. Area Survey surveyed the elevation and extent of the gravel portion of the ONCA SBPA interim cover on August 19, 2003.

Starting August 18, 2003, Environmental Contractors of Illinois (ECI) added topsoil to portions of the Off-Site Containment Area (OFCA) engineered cover where the thickness of the topsoil previously placed in the fall of 2002 did not meet the design requirement. These areas were located primarily near former swale 5, the eastern and northern portion of the OFCA, and the northeastern portion of the Kapica-Pazmey area of the OFCA. ECI scarified the ground and placed the topsoil in a 25-feet by 25-feet area where the thickness did not meet the requirement. ECI then re-seeded the filled area, placed straw on the areas, and demobilized from the site on August 19, 2003. ECI resurveyed the elevation of the topsoil layer to confirm that the thickness of topsoil met the design requirement.

Midwest Environmental, Inc. (MEI) repaired the erosion damage to the OFCA engineered cover during the week of August 25, 2003. MEI removed the vegetation and soil from the perimeter swales. Excess soil was stockpiled near the wood piles on the OFCA. MEI also trenched a shallow trench through swales 2 and 4 in order to install a 4-inch-diameter perforated, geotextile wrapped drainage pipe in the swales to facilitate drainage and minimize ponding near extraction well EW-20C. MEI also installed erosion matting along the western edge of the OFCA at swale 1 near extraction well EW-12.

Montgomery Watson Harza (MWH) reported that it operated the ONCA SBPA and OFCA ISVE systems intermittently during the reporting period. MWH reported that it replaced a faulty pH probe in Thermal Oxidizer Unit 2 on August 15, 2003. MWH began operating Thermal Oxidizer Unit 2 consistently with vapors from the ONCA SBPA ISVE system on August 25, 2003. MWH also reported that it encountered operation problems with operating Thermal Oxidizer Unit 1 during the week of August 25, 2003. MWH reported that the unit was unable to operate at the design temperature. MWH reported that the OFCA ISVE system did not operate at the end of the month because of the operational problems with Thermal Oxidizer Unit 1. MWH also reported that it will attempt to operate both the ONCA SBPA and OFCA ISVE systems, processing the vapor through Thermal Oxidizer Unit 2, next month.

MWH reported that the groundwater treatment plant (GWTP) was struck by lightening on the evening of August 1,2003. MWH reported that it did not receive an alert page that the GWTP was down. MWH discovered that the GWTP was not operating when it returned to the site on August 4, 2003. MWH reported that the lightening damaged several components and control panels in the GWTP. Austgen Electric began troubleshooting the problems and has resolved the majority of the problems. MWH operated the GWTP at 10 gpm during the week of August 11, 2003, primarily pumping from monitoring wells MW-56 and MW-10C because of control problems with the barrier wall extraction system and perimeter groundwater containment system wells.

MWH shut the GWTP down during the week of August 18, 2003, for scheduled maintenance activities. Independent Environmental Services (IES) and Austgen performed the maintenance activities on the GWTP. IES cleaned tank T-102, the aeration/equalization tank, a permit required confined space. IES wore a half-face respirator and tyvek suit to perform the confined space work. IES continuously ventilated the tank and performed air monitoring for the lower explosive limit (LEL) and oxygen, carbon monoxide, and hydrogen sulfide levels. IES reported that the oxygen level was within normal range and that the concentration of hydrogen sulfide and carbon monoxide were 1 ppm and 0 ppm, respectively. IES also reported that the LEL was less than 10%. IES and Austgen cleaned the clarifier, replaced the sand in the 1500-gallon-capacity sand filters, and performed other maintenance activities. MWH reported that IES and Austgen were unable to remove the air lift pump in the large sand filter; however, it would continue work on the pump on September 2, 2003. Cochrane Compressor replaced the compressor head for one of the air compressors at the GWTP on August 18, 2003. MWH operated the GWTP in recirculation mode for the remainder of the reporting period.

MWH reported that it will install a nanofiltration unit in the GWTP to reduce the hardness of the water used in the ISVE system scrubbers to prevent clogging of the nozzles and piping. Ryan Construction began installing piping in preparation for the nanofiltration unit on August 26, 2003. MWH reported that the nanofiltration unit is scheduled to be delivered to the site on September 5, 2003.

Attached are BVSPC weekly reports No. 127 through 130, correspondence, log book notes, and photographs of the daily activities. BVSPC's crew conducted oversight of the major field activities on August 8, 18, and 26, 2003. BVSPC's crew participated in two bi-weekly construction coordination meetings on August 7 and 21, 2003, via conference call because of construction inactivity at the site.

Topics of Concern:

• None to report.

Concern Resolution:

• None to report.

Upcoming Activities:

- MWH to begin operating the OFCA SBPA ISVE system.
- MWH to resume operating the GWTP.
- MWH to install the nanofiltration unit.
- MWH to perform the semiannual groundwater and annual residential well sampling events.

Signature:	Leigh Peters	Date:	September 5, 2003	

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Weekly Oversight Summary Report No. 127 ACS Superfund Site WA57, 46526.238

Reporting Period: Week of August 4, 2003.

BVSPC O/S Dates: August 8, 2003 (Mr. Campbell).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Ryan Construction	2	General Contractor
Austgen Electric	1	Electrical Contractor

Construction Activities

Major Activities:

- Ryan Construction repaired the damage it caused to the American Chemical Services employee breakroom building.
- Montgomery Watson Harza reported that the groundwater treatment plant sustained damage to several control panels after being struck by lightening.
- Austgen began repairing damage to the groundwater treatment plant control panels and components.
- Montgomery Watson Harza held the bi-weekly construction coordination meeting on August 7, 2003.

Activities Performed:

Ryan Construction repaired the damage it caused to the American Chemical Services (ACS) employee breakroom building during the installation of the concrete retaining wall.

Montgomery Watson Harza (MWH) reported that the groundwater treatment plant (GWTP) was struck by lightening on the evening of August 1, 2003. MWH reported that it did not receive an alert page that the GWTP was down. MWH discovered that the GWTP was not operating when it returned to the site on August 4, 2003. MWH reported that the lightening damaged several components and control panels. Austgen Electric began troubleshooting the control programming logic and repairing the damaged components. MWH and Austgen were able to resolve the majority of the programming problems and began operating the GWTP at a reduced flow rate of 10 gpm. MWH reported that it scheduled a shut down of the GWTP for August 18, 2003, in order to perform maintenance on several units within the plant.

MWH reported that the Off-Site Containment Area (OFCA) and On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) in-situ soil vapor extraction (ISVE) systems were not operating because of the damage to the GWTP. MWH reported that it was able to bring Thermal Oxidizer Unit 2 back up to temperature on August 7, 2003. MWH reported that it anticipated being able to operate the ONCA SBPA ISVE system consistently and begin monitoring the system in accordance with its *Performance Standard Verification Plan* by the end of the week. MWH also reported that it encountered communication problems with Thermal Oxidizer Unit 1. MWH began resolving the communication problems and reported that it would begin operating the OFCA ISVE system with Thermal Oxidizer Unit 2 in the interim.

MWH held the bi-weekly construction coordination meeting at the site on August 7, 2003. Black & Veatch Special Projects Corporation participated in the meeting via conference call because of limited construction activities.

Topics of Concern:

None to report.

Concern Resolution:

• None to report.

Upcoming Activities:

- MWH to begin operating the ONCA SBPA ISVE system consistently and perform monitoring of the system.
- Environmental Contractors of Illinois to add topsoil and reseed the OFCA engineered cover.
- Midwest Environmental, Inc. to perform maintenance activities to address erosional damage to the OFCA engineered cover.
- MWH to perform maintenance activities in the GWTP.

Signature:	Leigh Peters	Date: <u>August 15, 2003</u>
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WEEKLY CONSTRUCTION MEETING MINUTES FOR AUGUST 7, 2003 MEETING AMERICAN CHEMICAL SERVICE, NPL SITE **GRIFFITH, INDIANA**

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MEETING DATE: Thursday, August 7, 2003

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS Site – Site Trailer

ATTENDEES: Kevin Adler - U.S. EPA (via telephone)

Aaron Potts - Environ (via telephone)

Tom Tinics – MWH

Leigh Peters - BVSPC (via telephone)

Lee Orosz – MWH

Jon Pohl – MWH (via telephone) Chris Daly - MWH (via telephone)

TOPICS:

Health and Safety Summary

No health and safety incidents have occurred at the Site since the last meeting on July 24, 2003. Activities at the site during the past two weeks included the continued operation of the groundwater treatment plant (GWTP), operation of the Off-Site Area In-situ Soil Vapor Extraction (ISVE) system and the Still Bottoms Pond Area (SBPA) ISVE system, construction of a stormwater diversion berm around the ACS breakroom building, and repair of minor damage done to the breakroom building when a subcontractor backed into

Groundwater Treatment Plant (GWTP) Status

The GWTP operated at approximately 20 gallons per minute (gpm) until August 1st when the plant building was struck by lightning. The lightning damaged some of the control and communication systems causing the plant to shut down. Because the communication system was damaged, no alert was sent out that the GWTP was down. However, the system shutdown successfully and there was no release from the system. The GWTP was brought back online on August 4th with an extraction rate of approximately 10 gpm. A subcontractor of Austgen Electric has been onsite repairing the damaged control and communication components. Approximately 70 percent of the problems caused by the lightning strike have been corrected.

The GWTP is scheduled to be offline beginning August 18th for routine maintenance. Maintenance will include cleaning tank T-102 and checking the diffusers, cleaning the clarifier, and changing out the sand in the sandfilters. The tasks involved in cleaning T-102 will involve a confined space entry, which will be performed with the assistance of

Construction Meeting Minutes

August 12, 2003

ACS NPL Site

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Independent Environmental Services (IES). It is anticipated that the maintenance work will be completed by August 20th.

Off-Site Arca/SBPA ISVE Systems

The Off-Site Area ISVE has been operating on an intermittent basis for the past two weeks. The vapors from this system are being sent to Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1). The SBPA ISVE ran consistently during the week of July 28th until the plant was struck by lightning. The system was brought back online on August 4th along with the GWTP. All the wells for the SBPA ISVE system are open. Monitoring of the system will begin when the system operation is stabilized. Vapors from the SBPA ISVE system are being sent to Thermal Oxidizer/Scrubber Unit 2 (Therm Ox 2).

SBPA Cover

Ryan Construction was onsite July 28th to complete the construction of the concrete berm around the ACS breakroom building to divert stormwater around the building and eliminate the potential for flooding during heavy rain events. Ryan was onsite again on August 6th to repair minor damage caused to the breakroom building during the construction of the concrete berm.

Erosion of the gravel in the SBPA cover area has been observed after heavy rainfall occurred at the Site. The erosion damage was repaired using a skid loader. Future crosion of the gravel will be repaired in the same manner until the asphalt layer (final cover) is placed.

Off-Site Area Cover

Midwest Environmental, Inc. (MEI) has been selected as the contractor to repair the erosion areas in the Off-Site Area cover and MWH has ordered the material necessary for the work. This work will be completed within the next two weeks.

Environmental Contractors of Illinois (ECI) is scheduled be onsite the week of August 18th to add topsoil to areas of the Final OFCA Cover that did not meet the minimum topsoil thickness requirement. It is anticipated that this work will take approximately one week to complete.

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Looking Ahead

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Week of August 11, 2003	 GWTP/BWES/PGCS operation Off-Site ISVE operation SBPA ISVE operation
Week of August 18, 2003	 Off-Site ISVE operation SBPA ISVE operation Maintenance work in the GWTP MEI will repair areas of erosion damage in the OFCA Cover Area ECI will complete addition of topsoil to low areas in the OFCA Cover Area
Health and Safety Items to Monitor	Items include: Confined space entry to clean T-102 Traffic related to work in the OFCA

Next Weekly Construction Meeting - Thursday, August 21, 2003, 10 a.m.

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Weekly Oversight Summary Report No. 128 ACS Superfund Site WA57, 46526.238

Reporting Period: Week of August 11, 2003.

BVSPC O/S Dates: Cancelled because of limited construction activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
Fliteway	2	ONCA SBPA ISVE System Blower Shed Contractor

Construction Activities

Major Activities:

- Fliteway installed a vibration damper between the condensate knockout tank and blower in the On-Site Containment Area Still Bottoms Pond Area in-situ soil vapor extraction system blower shed building #1.
- Montgomery Watson Harza resumed operating the Off-Site Containment Area in-situ soil vapor extraction system, processing vapors through Thermal Oxidizer Unit 1.

Activities Performed:

Fliteway installed a vibration damper between the condensate knockout tank and the blower in the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) in-situ soil vapor extraction (ISVE) system blower shed building #1 on August 15, 2003. Montgomery Watson Harza (MWH) reported that it encountered system faults with the pH probe in Thermal Oxidizer Unit 2. MWH ordered a replacement probe and installed it on August 15, 2003. MWH anticipated operating the ONCA SBPA ISVE system and Thermal Oxidizer Unit 2 next week after the maintenance activities are complete in the groundwater treatment plant (GWTP). MWH reported that it resumed operating the Off-Site Containment Area (OFCA) ISVE system, processing vapors through Thermal Oxidizer Unit 1.

MWH reported that it resumed operation of the GWTP and continued to repair the damage sustained by the plant after being struck by lightening on August 1,2003. MWH reported that the GWTP operated at 10 gpm, pumping water primarily from monitoring wells MW-10C and MW-56. MWH reported that the control systems for the barrier wall extraction system and perimeter groundwater containment system required additional repair. MWH also reported that the shut down of the GWTP is still scheduled August 18, 2003, in order to perform maintenance on several units within the plant. MWH reported that the maintenance activities will include cleaning of the aeration/equalization tank T-102, cleanout of the clarifier, replacement of the sand in the 1500-gallon-capacity sand filters, and repair of the air lift in the large sand filter. MWH also reported that it expects to resume operating the GWTP on August 20, 2003.

MWH reported that on August 18, 2003, Environmental Contractors of Illinois (ECI) is scheduled to add topsoil and reseed areas of the OFCA engineered cover where the thickness of topsoil does not meet the design requirements. MWH also reported that Midwest Environmental, Inc. (MEI) will begin repairing the erosion damage to the OFCA cover on August 25, 2003.

Topics of Concern:

None to report.

Concern Resolution:

• None to report.

Upcoming Activities:

- MWH to begin operating the ONCA SBPA ISVE system consistently and perform monitoring of the system.
- ECI to add topsoil and reseed the OFCA engineered cover.
- MEI to perform maintenance activities to address erosional damage to the OFCA engineered cover.
- MWH to perform maintenance activities in the GWTP.

Signature:	Leigh Peters	Date: <u>August 19, 2003</u>	
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Weekly Oversight Summary Report No. 129 ACS Superfund Site WA57, 46526.238

Reporting Period: Week of August 18, 2003. BVSPC O/S Dates: August 18, 2003 (Ms. Peters).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	1	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Environmental Contractors of Illinois	5	OFCA Engineered Cover Contractor
Independent Environmental Services	3	Specialty Contractor
Austgen	1	Electrical Contractor
Cochrane Compressor	2	Compressor Contractor
Area Survey	2	Surveying Contractor

Construction Activities

Major Activities:

- Environmental Contractors of Illinois added topsoil and seeded a portion of the Off-Site Containment Area engineered cover where the topsoil cover did not meet the design requirements.
- Independent Environmental Services and Austgen performed maintenance activities in the groundwater treatment plant.
- Cochrane Compressor replaced a compressor head for an air compressor at the groundwater treatment plant.
- Area Survey surveyed the gravel portion of the On-Site Containment Area Still Bottoms
 Pond Area interim cover.
- Montgomery Watson Harza held the weekly construction coordination meeting on August 21, 2003.

Activities Performed:

Starting August 18, 2003, Environmental Contractors of Illinois (ECI) added topsoil to portions of the Off-Site Containment Area (OFCA) engineered cover where the thickness of the topsoil previously placed in fall 2002 did not meet the design requirement. These areas were located primarily near former swale 5,

the eastern and northern portions of the OFCA, and the northeastern portion of the Kapica-Pazmey area of the OFCA. ECI scarified the ground and placed the topsoil in a 25-feet by 25-feet area where the thickness did not meet the requirements. ECI then re-seeded the filled areas and demobilized from the site on August 19, 2003. ECI resurveyed the elevation of the topsoil layer to confirm that the thickness of topsoil met the design requirements.

Montgomery Watson Harza (MWH) shut down the groundwater treatment plant (GWTP) on August 18, 2003, as previously scheduled in order for Independent Environmental Services (IES) and Austgen to perform maintenance on several units within the GWTP. IES cleaned tank T-102, the aeration/equalization tank, a permit required confined space. IES wore a half-face respirator and tyvek suit to perform the confined space work. IES continuously ventilated the tank and performed air monitoring for the lower explosive limit (LEL) and oxygen, carbon monoxide, and hydrogen sulfide levels. IES reported that the oxygen level was within normal range and that the concentration of hydrogen sulfide and carbon monoxide were 1 ppm and 0 ppm, respectively. IES also reported that the LEL was less than 10%. IES and Austgen cleaned the clarifier, replaced the sand in the 1500-gallon-capacity sand filters, and performed other maintenance activities. Cochrane Compressor replaced the compressor head for one of the air compressors at the GWTP on August 18, 2003.

Area Survey surveyed the top of the gravel cover in the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA). MWH reported that Ryan Construction completed the repairs to the American Chemical Services (ACS) employee breakroom building wall; however, the door still needs to be replaced.

MWH reported that it repaired approximately 95% of the damage to the GWTP that had been caused by the lightening strike on August 1, 2003. MWH also reported that it will resume pumping from the barrier wall extraction system wells in addition to monitoring wells MW-10C and MW-56 next week. MWH reported that because of the reduced pumping, the water level in the ONCA SBPA has risen approximately 3 feet. MWH also reported that the water levels in the OFCA did not change significantly.

MWH did not operate the ONCA SBPA and OFCA in-situ soil vapor extraction (ISVE) systems during the week, while maintenance activities were conducted in the GWTP. MWH reported that it will resume operating the ISVE systems next week. MWH also reported that it will be installing a nanofiltration unit in the GWTP to reduce the hardness of the water used in the ISVE system scrubbers to prevent clogging of the nozzles and piping. MWH reported that the unit will be delivered to the site on September 5, 2003, and that Ryan Construction will be onsite next week to install additional piping in the GWTP.

MWH reported that Midwest Environmental, Inc. (MEI) would begin repairs to the erosion in the OFCA next week. MEI will be removing vegetation and soil from the swales, adding erosion fabric along swale 3, and will also mitigate the ponding water in swale 4 near extraction well EW-20C.

MWH held the bi-weekly construction coordination meeting at the site on August 21, 2003. Black & Veatch Special Projects Corp. participated in the meeting via conference call because of the construction inactivity at the site.

Topics of Concern:

• None to report.

Concern Resolution:

• None to report.

Upcoming Activities:

- MWH to begin operating the OFCA and ONCA SBPA ISVE systems.
- MEI to perform maintenance activities to address erosional damage to the OFCA engineered cover.
- MWH to resume operating the GWTP.
- MWH to install the nanofiltration unit.

Signature:	Leigh Peters	Date:	September 2, 2003
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WEEKLY CONSTRUCTION MEETING MINUTES FOR AUGUST 21, 2003 MEETING AMERICAN CHEMICAL SERVICE, NPL SITE GRIFFITH, INDIANA

MEETING DATE: Thursday, August 21, 2003

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS Site - Site Trailer

ATTENDEES: Kevin Adler - U.S. EPA (via telephone)

Larry Campbell - BVSPC (via telephone)

Lee Orosz – MWH Chris Daly – MWH

Rob Adams – MWH (via telephone) Todd Lewis – MWH (via telephone) Jon Pohl – MWH (via telephone)

TOPICS:

Health and Safety Summary

No health and safety incidents have occurred at the Site since the last meeting on August 7, 2003. Activities at the site during the past two weeks included the continued operation of the groundwater treatment plant (GWTP), routine maintenance of the GWTP including confined space entries, operation of the Off-Site Area In-situ Soil Vapor Extraction (ISVE) system and the Still Bottoms Pond Area (SBPA) ISVE system, additional topsoil placement in the Off-Site Cover Area, and repair of minor damage done to the ACS breakroom building when a subcontractor backed into it.

Groundwater Treatment Plant (GWTP) Status

The GWTP operated at approximately 10 gallons per minute (gpm) during the week of August 11th. The plant influent was drawn mainly from wells MW-56 and MW-10C during this week. Influent from the perimeter groundwater containment system (PGCS) and barrier wall extraction system (BWES) was limited due control system problems caused by lightning striking the GWTP building on August 1st. Approximately 95 percent of the electrical and control problems caused by the lightning strike have been corrected. The GWTP was shut down on August 18th in order to perform routine maintenance that included emptying and -cleaning multiple tanks. The plant is scheduled to be brought back online on either August 22nd or 25th.

Routine water levels measured at various locations indicated that the groundwater elevation has risen within the barrier wall during the last few weeks while the GWTP has been operating intermittently. Water levels in the Off-Site Area did not change significantly. However, the water levels in the SBPA rose an average of approximately

Construction Meeting Minutes

August 26, 2003

ACS NPL Site

three feet. This rise in the SBPA is also attributable to the heavy rainfall at the Site during the last few weeks.

Off-Site Area/SBPA ISVE Systems

Both ISVE systems operated intermittently during the week of August 11th with Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1) treating the vapors from the Off-Site Area ISVE system and Thermal Oxidizer/Scrubber Unit 2 (Therm Ox 2) treating the vapors from the SBPA ISVE system. Therm Ox 2 was brought online August 19th and has been operating consistently since that date. Therm Ox 1 was also brought online August 19th but a high pressure alarm caused the unit to shut down late on August 20th. Austgen Electric is scheduled to be onsite during the week of August 25th to the correct the pressure control problem in Therm Ox 1.

The nanofiltration unit is scheduled to be shipped to the site on September 5th. Prior to it's delivery, piping and controls reconfigurations will be completed to accommodate the unit.

SBPA Cover

Ryan Construction has completed the repairs to the ACS breakroom building siding that was damaged during the construction of the concrete berm around the building to divert stormwater.

MWH plans to clean gravel from the stormwater catch basins on the perimeter of the cover area. Once the gravel is removed, erosion control matting will be placed over the catch basin to limit future erosion in these areas. Periodic maintenance of the gravel will be performed to fix future erosion that occurs prior to placement of the asphalt layer_in | 2004. A survey of the gravel layer was completed by Area Survey on August 19th. The contours of the gravel layer will be included in a figure in the SBPA Interim Engineered Cover Construction Completion Report.

Tom Froman of ACS has informed MWH that there are several concerns regarding ACS' restriction from driving in certain areas of the SBPA. MWH will review the ACS concerns and respond to Mr. Froman.

Off-Site Area Cover

Environmental Contractors of Illinois (ECI) was on-site on August 18th and 19th to place additional topsoil in areas of the Off-Site engineered cover area that did not meet the thickness requirements for topsoil following construction. The ground in each area was scarified, ECI placed and compacted additional topsoil from Austgen Equipment with a seeding tractor, seed was applied, and straw was placed. Surveys were completed before and after the work to confirm that a sufficient amount of topsoil was placed.

Midwest Environmental, Inc. (MEI) is scheduled to be on-site on August 25th to repair the erosion areas in the Off-Site Area cover. MWH will submit a response to Agency comments regarding the erosion repair work plan on August 22nd.

Construction Meeting Minutes
August 21, 2003 Meeting

August 26, 2003

ACS NPL Site

Looking Ahead

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Week of August 25, 2003	 GWTP/BWES/PGCS operation Off-Site ISVE operation SBPA ISVE operation Complete GWTP repairs and maintenance Electrical and control repairs and upgrades 	
Week of September 1, 2003	 Off-Site ISVE operation SBPA ISVE operation Reconfigure piping and controls to accommodate the nanofiltration unit 	
Health and Safety Items to Monitor	Items include: Use of equipment for repairs and upgrades Electrical hazards associated with upgrades and repairs	

Next Bi-weekly Construction Meeting - Thursday, September 4, 2003, 10 a.m.

JDP/RAA/PJV

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Weekly Oversight Summary Report No. 130 ACS Superfund Site WA57, 46526.238

Reporting Period: Week of August 25, 2003.

BVSPC O/S Dates: August 26, 2003 (Mr. Campbell).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Midwest Environmental, Inc.	6	OFCA Engineered Cover Erosion Repair Contractor
Ryan Construction	2	General Contractor

Construction Activities

Major Activities:

- Midwest Environmental, Inc. repaired the erosion damage to the Off-Site Containment Area engineered cover.
- Montgomery Watson Harza resumed operating the On-Site Containment Area Still Bottoms Pond Area in-situ soil vapor extraction system.
- Ryan Construction installed additional piping at the groundwater treatment plant in preparation for the installation of a nanofiltration unit.
- Montgomery Watson Harza operated the groundwater treatment plant in recirculation mode.

Activities Performed:

Midwest Environmental, Inc. (MEI) repaired the erosion damage to the Off-Site Containment Area (OFCA) engineered cover. MEI removed the vegetation and soil from the perimeter swales. MEI stockpiled excess soil near the wood piles on the OFCA. MEI also trenched a shallow trench through swales 2 and 4 in order to install a 4-inch-diameter perforated, geotextile wrapped drainage pipe in the swales to facilitate drainage and minimize ponding at extraction well EW-20C. MEI also installed erosion matting along the western edge of the cover at swale 1 near extraction well EW-12.

Montgomery Watson Harza (MWH) resumed operating the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) in-situ soil vapor extraction (ISVE) system, processing vapors in Thermal Oxidizer Unit 2. MWH reported that it began operating the OFCA ISVE system, processing the vapors in Thermal Oxidizer Unit 1; however, the oxidizer shut down when it reached the operating temperature.

Looking Ahead

LOOKING AIRCHO	
Week of August 11, 2003	 GWTP/BWES/PGCS operation Off-Site ISVE operation SBPA ISVE operation
Week of August 18, 2003	 Off-Site ISVE operation SBPA ISVE operation Maintenance work in the GWTP MEI will repair areas of erosion damage in the OFCA Cover Area ECI will complete addition of topsoil to low areas in the OFCA Cover Area
Health and Safety Items to Monitor	Items include: Confined space entry to clean T-102 Traffic related to work in the OFCA

Next Weekly Construction Meeting - Thursday, August 21, 2003, 10 a.m.

JDP/CAD/PJV
J:\209\0601 AC\$\0202 MWA PM\Meeting Minutes 2003\Meeting Minutes 08-07-03.doc

MWH reported that it was unable to operate the OFCA ISVE system with Thermal Oxidizer Unit 1 and that it would investigate the cause for the operational errors.

Ryan Construction began installing piping in preparation for the nanofiltration unit scheduled to be delivered to the site on September 5, 2003. MWH began operating the groundwater treatment plant (GWTP) in recirculation mode. MWH reported that it was unable to remove and repair the air lift pump in the large sand filter unit in the GWTP last week.

Topics of Concern:

None to report.

Concern Resolution:

• None to report.

Upcoming Activities:

- MWH to begin operating the OFCA SBPA ISVE system.
- MWH to resume operating the GWTP.
- MWH to install the nanofiltration unit.
- MWH to perform the semiannual groundwater and annual residential well sampling events.

Signature:	Leigh Peters	Date:	September 2, 2003	

t:\projects\acs-raos\osr\2003\08\0825.wpd

8 Aug 03 2130pm Horre on site party cloudy, warm 787 Personnel On Ste Lee cross must Tem Jennes must Ben Baker Austjos Ling Canyhear Brige 2140 Discussion Lot Ton Tenies Both 15VE systems are operating OFCA ISVE going through Dohr Unit. ONCA ISVE gring this Globie Unit. SKII finding Simon problems Resulting from 1. 4 hereing Strike last weekend. Hope to have beth and hering in Auto for weakened 031209 Rdl 46, Photo 5 Lealury N at new refaining Well on W sid A break very Roll 46, Phin & Locking N at New Cotaining will on Eside A breck Voem Coll 46, Phin 7 Lowery W at M lample

new roming a. 1x at 5 54 1 Brown room 0335 21 46 Ph. 10 8 docking 340 from ME anse of OACA SEPA Near ACS Cintacting dack Sheeing raix eresion gully, Mast cossion 64 My, have been reported

C336 Rest 46 Photo 9 Leaving & estars

N' 5 16 1 feneral array 2 SBPB 1516 and area. Note exis Sect in finery is sormer con rapper straps of San buss to 13) in my 31 margored during Strong By 145 pelas dover in CECA Nic apparant increase in ours, in 901191 on W. 5 od of parch too Tim Tenies report the Asia Middles of pround a box this area to fix atta Cour Coursen gray 0415 Ar At 514 for Das

Af Witn 8/7/03 1000 Bi Weekly Construction Mtg - BYSPC participated via conference call Participants: Tom Tinks mut at sike Lee Orosz MWH at site via phone: Chris Daly MWH Joh Pohl HWH Kevin Adler EPA Aaron Potts Environ H+S: No incidents; mosquitos still problem at site: Ryan Construction ousite one day last week and this week. Rain Sterms at site GWTP: Currently at 10 gpm, Lightening struck plant last folday -MWH found everyteing down tast AN TO on Monkey. MWH not paged GNTP troubles hooting 70%. resolved - Hoping to traish troubleshooting This week. ONCA/OFTA ISVE: Operated aNCA ISVE with Thermox 2 on 2 off last week and began consistent operation this week Plan tostart PSVP monitoring today and to collect influent + efficient Leb aratery sumples. OFCA ISVE running intermitantly on Durk thermax I unt

Sfl Epatin

MWH Andre problems in programming for unti- possibly related to lightening strike. General Construction: Pyan and onsite and completed curb last Monday. Ryan out 1 day this weeks to repair damage it caused to this break blag + to wish next weeks. 801. complete LOOK Ahead: GNTP Maintenance 3/18 -. T-102 clean ont - confined space O Clean clarifier o replace sund in 1500 gall sand ressels e pull aid lift from large sand filter OFFA Broslon MEL ISH MIHLA bIA tO MWH ECI to add topsoil in thin areas and resced work to ockur in and of August. GW 5 mplsing 1. September. His look street : Contrad space dring cleanent of T-102. Trathe during of ca cover Actines. 1030 Mtg conclude - Next Mtg August 21@ 10 Am

8/18/03 Hg/5 peter Amive onsite, Sunny, clear, NW wind, 705 Personnel Present: Lee 01052 MWH Dan Petrich IES Terrence John 1ES Mike Moto to Patrick IES Tim Kirkland Astgan Craig Civingston + Cochrane Compressor Leigh Peters BUSPC. GWIP and ISVX systems dian. MWH and les performing maintenance on plant. 1ES cleaning acration / equalization tunk TIOZ. MUH also toplean sund Alters. Lee Orosz reported cochrare changing out a compressor head, Austgen helping with MISCEllaneons work in GWPP, EZ/ to be out today for low, thin topsoil cover areas on OFER inginarial cover 1. 00032 a/80 reported that MWH isstalled new pt probe into Thermox 2 on Friday morning must to Calibrate probe; but unit should be up and. running shoully ince complete. 0810 IES praparing tov T-102 element, IES pumping excess water from tack. 185 reported that it will ventilate with far Ay Elita

Top & Petus 8/18/03 and actermine respiratory protection 15 prepared for supplied air. 185 +150 tolling out permit for confined space. 0815 Area Survey onsite to perform surveys at ONCH SBPA top of gravely catches ins, etc Est ansite to stake out OFCA corer for areas of fill landscapers to be onsite after lunch Echobes to be done by noon to maron - need to bed ~ 2 inch 14 x guester acre area 0930 /ES Still pumping 1 gnia from 102. 1ES reported that it expects to start ranging 5/4dge around 1030. 0935 Went to ONCA, observed Area Survey surveying Points on SAPA cover Observed mut has painted 15 an Australian well concrete and Cover gravel looks good no proston in come observed Did observe places of hething placed or sporting of cover; west of access road to minimize erosin damage at cetal bishs MANH Aroda et all basin locations 0955 Poll 47 Photo 1 facing SE of geo hetting placed on cover hear JVE-BO and SVE-BZ. 1005 Roll 47 Phora 2 facha 5 of 1ES ventilating 17/02. 165 reported that It abserved some 1/25 Headings inside touch From & Petra

1013 Roll 47 Photo 3 town Not IES donning PPE for entry into 1702 1015 Roll 47 Photo 4 toung NW of 1ES antony 1702 1ES Visumed ventilating trank after intry and monitored LEZ, Oz, Hz Sand CO. 1025 Dan Petrich reported 02 at 21,2% but cruything use ok LA 10% Cos 0, H25-pm 1046 Went to OPEA, load of dirt delivered by Assign; Sarveyors sorveying and staking want of till avers. 1/20 1. 00052 reported 1E5 breaking for lanch; to continue work afterwards - Its still trying to pump down the tank 1145 Returned to GWTP, 1ES suported another 1-Inch of water remaining to pump ent. Then 1ES to remove s/rdge 1215 1ES continuing to primp out waterfrom 1225 Rull 47 Photo 5 facing NW of IES pumping studyed from 7/02. 1250 1ES reported that it suaped off the acrators and checked the pings to make sure everything is clear 1310 Roll 47 Photo 6 facing 5 of Cochrane installing new compressor head

The ERETA

149

1325 went to OFCA and observed where
states placed for additional till thems
include near access road; K. P. area (N),
NE portion of well field N of blower
Shed. Also additional fill needed near
swale 5; was tot blower shed.

1330 Roll47 Photo 7 taking Wot topsoil and stakes in background for areas that need fill ItI placing fill in 25 foot square patch around stakes.

1345 T. Times reported MEI likely to be on-the
next week for OFER engineered cap
maintenance - MUHI warring for EZI to
be complete with its work prior to ME:
coming on site. Multiplicate reported it hopeed
to have GWTP buck up truning on
wednesday.

1400 Left Site for day

19/18/03

21 August 2003 Biweakly Construction mtg. Participants: o site: Lor orosa + oliv Duty a must of to: Todd Lows of John Pohl in car via plany: Reb Alones V. phone I cavin Adba EPA Larry Pampboll BUSPC HAS - No incidents in 14,+ 2 was Evan though there had been much activity at site for maint extinities in GWTP. Confined sper entry wito Varrous ten les vi tore GUTP. SATI doing Maintenana. Temp. has been V. high. Have pooling sta. w/ Gabraide. GWTP Have had electrical problems because of light oning storks 2 willy ego. Plant down this Week for maintonance since Monday. Romaining WEIK is to clean sound Ella pump. Expect to be open-traval by Friday or next money letest. Have solver about 95% of alochrical problems Previous week had been pumping =10 gpm Ouly from mw 56 and 10C In Campber

Colden + get OFCA wills to pung regularly - Have theat problem fix en and will now pump from all walls. Because 1 reduced pamping 3:4 x shim What tiby els a over has rising. Not as much visi ai OFCA 15VE Both 595 toms Were operating but Thermax I (Deve) want down 165 evenyes Now bring is it bank on 1. no. Thorno Z (Glaber) covering fine + pulling Various In ONCA SBPA OFTH - ECI MS: Le Mon & The placing tops 1 in a reas 1 0 Feat rap that in too then based on savery data. Ell properted Topsell Spore of & amperter it, sorder + devera un strace. Ect will resury son sporte Kyan donst dample led repaired to As Brove Boom Wall. Still need to replace demost door. Look Theer Nestween: must do mobilize h site en repair often erosion aver. Must will 15 se A roa response be comments on ever in Friely much has wil have a scriver In Campley

ENCAGravel Surface As-built. Mat will meet us Tom Forkam AACS to digues ACS Truck Gocoss over gravel to knowing dock, of. · Some fine Rock is evoding down Stype into Storm Sour drain Will Continue Maintename 1 that All Haplatt procement places · Nano hiller 13 schoolslad for Shipment on 9/5 .- Will need B reconfigured son piping to for nanofiller · Must will delay paving in asphalt in ONCA SOPA Cay toll next sping, The GNCA ISVE wells are Not producing as well as expested. Next Meeting - Thin Sept 4 pire with our The state of the s

26 Huy 2663 C545 /Annow Cin 5:16-Partly Woody a humanich, bet SCF Terseniel dusist Lec Cross illust Steve Flora MER Dan Lausen Tony Ferribi Town Mallery Darige Colver 1 (Stell Source) Ade in Sands 171 1 Jerry Many 12 years Tray Faint muit Todd here's Lairy Currythey BUSPE

Se that eacher from 7 2 Cen be supplied to cither theorement with 1 co 2

1910 Then 47 Photos Leckness Sec 44, west Showing from Tank T2 to account the property of the count that a first the first the count that a first the first t

8/24/03 8/26/03 Total under the run 1 21-5 0942 Rell 47 Photo 11 Locking 1 (per hone I froblew Vered's de Stant at Showing rowing Near when reacher months Toup Seil. Soil to be relepted livery Therene 2 words profis with must from swall to area near word pile To de expets to get lay Teb 0945 Rell 47 Plaje 12 Les larve N granded on stept Comple a cake But pipes widel blest aredied Piets be extended to some up Free nearles en Charles 1030 121147 Parto 15 Lockery N 0947 Re1147 Plato 13 Concine 5 in CNEA Showing points plants = At Swale 1. MEL Classed GUT grid present in vidousty 1 Chain 30.1-Now adding New 119xap basin in offert to Course 1 cosson 0956 Rell 47 Phelo 14 Locking 5 at CFCB - Straw avered area 1160 Mun Started Pulling Great Cours is location of Read topsell to Capris inte therman 2 . Very vere trylet require thickn is 1000 Disc of Todal bon 5 GOTP Percelly with high and vapor from area were dilutes with levete durrantly in recirculation wiede. and deglers from OFCO Hope to restart treetment later teday, 1115 Roll 49 Phak 16 Losland F Share List pumper Sand file 15 W' Shother, Filher wagged flow 46 Stuck - Clan't remove by pulling. pipe to be in still on trend, in will have to remove same (prob. next wax). 1626 B1147 Photo 17 Copins Se - cha The young units both vestante SHOW my Straw Contrad Comes where This proming - coming up to sperting COLLINATIONAL TENGIL IS Seen dec un placement Temp. Will then pull caper Mist wall Som both ONEN JORCH GUE APUS My Camplice In amybell

Roll 47 Photo 15 Lockerny SE at Niend of Extended pipes under checkie conduit in OFter Roll 47 Phale 19 besting 500 Allow they Treveller eliging formely for 4" flexibly sight at E end 1) to Sicole 4 1145 Rell 47 Phil 20 Cooling 5 Showing MEI Minning Excess Soil from Swal 3. + velogity it to vicinity of free truckes 1155 Left 516

9/4/03 Des Elean

157

10:00 BiNeckly Construction Mating Attenders:

Lee Brosz MNH
Prabakhar Kasarabada IDEM
Via Phone:

Kevin Adler EPA Leigh Peters BVSPC
Rob Adams MWH Jon Pobl MWH
Chad Smith MWH Mike Mes arch MWH

H+S: No 155UCS; 1ES removed pump from

large sand filter; fled off w/ harness. MEI

workingon OFCA; hot meather water stations

bug/bee problem-called exterminator and resolved.

GWTP: Ourrently in recirculation since 8/25.

down week of 8/18 for Maintenance. Biomass

potentially deceased mult sampled and will

have results this week. Mult may need to

provide outside seed. MIWH to evaluate

switching to smaller biozone. Carbon

forled w/ biomass-changeout scheduled

9/15. MWH discharged I day + collected

compliance sample. Nanofilter to be delivered

9/5. Austgen/Ryan to install Monday.

15VE: Thermox 2 at 100% since 8/27; processing ONCA; added OFCA vapors yesterday. All ONCA wells open; 17 OFCA wells online

Syl Spety





Proj. #: 46526

Roll: 47 Photo #1

Date: 08-18-03 Time: 09:55

Photographer: Leigh Peters

Description: Photo facing southeast showing the geonet

placed over the ONCA SBPA catch basin located between SVE-80 and SVE-82 to

minimize erosion of the gravel.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #2

Date: 08-18-03 Time: 10:05

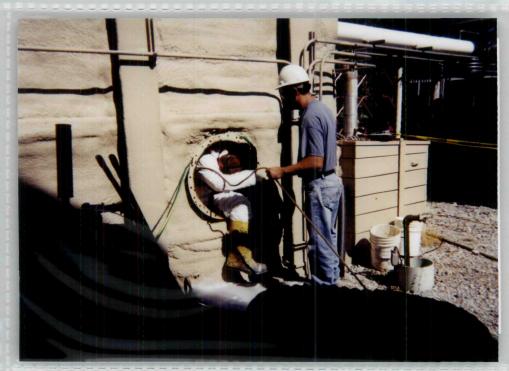
Photographer: Leigh Peters

Description: Photo facing south showing IES ventilating

the aeration/equalization tank T-102 prior to entering the permit required confined

space for tank cleaning.





Proj. #: 46526

Roll: 47 Photo #3
Date: 08-18-03 Time: 10:13

Photographer: Leigh Peters

Description: Photo facing north showing IES donning

PPE for entry into the aeration/equalization

tank T-102.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #4
Date: 08-18-03 Time: 10:15

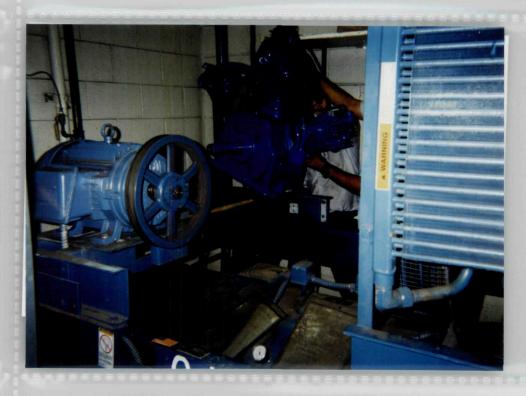
Photographer: Leigh Peters

Description: Photo facing northwest showing IES

entering the aeration/equalization tank T-

102 for tank cleaning.





Proj. #: 46526

Roll: 47 Photo #5 Date: 08-18-03 Time: 12:25

Photographer: Leigh Peters

Description: Photo facing northwest showing IES

pumping excess water from the

aeration/equalization tank T-102.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #6 Date: 08-18-03 Time: 13:10

Photographer: Leigh Peters

Description: Photo facing south showing Cochrane

Compressor installing a new compressor head on an air compressor in the GWTP.





Proj. #: 46526

Roll: 47 Photo #7
Date: 08-18-03 Time: 13:30

Photographer: Leigh Peters

Description: Photo facing west showing the topsoil for

placement on the OFCA engineered cover and stakes marking the locations in former swale 5 where additional topsoil is needed. Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #8
Date: 08-26-03 Time: 09:10

Photographer: Larry Campbell

Description: Photo facing southwest showing Ryan

Construction installing water piping from tank T-1 to Thermal Oxidizer Units 1 and

2.





Proj. #: 46526

Roll: 47 Photo #9
Date: 08-26-03 Time: 09:15

Photographer: Larry Campbell

Description: Photo facing southwest showing Ryan

Construction installing water piping from tank T-1 to Thermal Oxidizer Units 1 and

2.

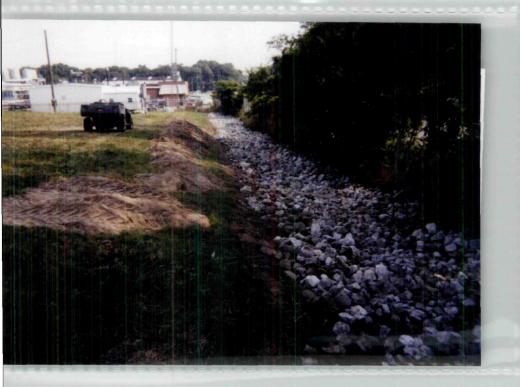
Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #10
Date: 08-26-03 Time: 09:30
Photographer: Larry Campbell

Description: Photo facing west showing the trench dug

in swale 4 for the 4-inch-diameter perforated piping to drain swale 4.





Proj. #: 46526

Roll: 47 Photo #11
Date: 08-26-03 Time: 09:40

Photographer: Larry Campbell

Description: Photo facing north at swale 3 showing the

soil that has been removed from the swale and will be relocated to the area near the

wood pile on the OFCA.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #12 Date: 08-26-03 Time: 09:45

Photographer: Larry Campbell

Description: Photo facing north showing the piping that

is to be extended located underneath the

electrical conduit in the OFCA.





Proj. #: 46526

Roll: 47 Photo #13 Date: 08-26-03 Time: 09:47

Photographer: Larry Campbell

Description: Photo facing south at swale 1 showing

where MEI removed the soil from the

swale and is replacing the riprap.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #14

Date: 08-26-03 Time: 09:50

Photographer: Larry Campbell

Description: Photo facing south showing the straw

covered area on the OFCA engineered cover where additional topsoil was placed by ECI to meet the design thickness.





Proj. #: 46526

Roll: 47 Photo #15 Date: 08-26-03 Time: 10:30

Photographer: Larry Campbell

Description: Photo facing north in the ONCA showing

the geonet placed in the vicinity of the catch basin near SVE-82 in order to

minimize gravel erosion.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #16
Date: 08-26-03 Time: 11:15
Photographer: Larry Campbell

Description: Photo facing east showing the 4-inch-

diameter slotted, filter wrapped flexible pipe to be installed in the trench in swale 4.





Proj. #: 46526

Roll: 47 Photo #17
Date: 08-26-03 Time: 11:20

Photographer: Larry Campbell

Description: Photo facing southeast showing the straw

covered area on the OFCA engineered cover where additional topsoil was placed by ECI to meet the design thickness.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #18
Date: 08-26-03 Time: 11:25

Photographer: Larry Campbell

Description: Photo facing southeast showing the north end of the pipes located below the

electrical conduit crossing swale 3 that

were extended.





Proj. #: 46526

Roll: 47 Photo #19 Date: 08-26-03 Time: 11:35

Photographer: Larry Campbell

Description: Photo facing southwest showing MEI

trenching for the placement of the 4-inch-

diameter flexible pipe in swale 4.

Site: American Chemical Services, Inc.

Proj. #: 46526

Roll: 47 Photo #20 Date: 08-26-03 Time: 11:45 Photographer: Larry Campbell

Description: Photo facing south showing MEI removing

excess soil from swale 3 and relocating the soil to the vicinity of the stockpile of tree

trunks.